



U.S. Department  
of Transportation

Research and  
Special Programs  
Administration

400 Seventh Street, S.W.  
Washington, D.C. 20590

APR 16 1999

Mr. Richard S. Varga  
Rossborough Manufacturing Co.  
P.O. Box 38  
33565 Pin Oak Parkway  
Avon Lake, OH 44012-0038

Ref. No. 99-0061

Dear Mr. Varga:

This is in response to your letter dated March 5, 1999,  
concerning the definition of "non-DOT specification portable  
tanks suitable for the transport of liquids."

When the Hazardous Materials Regulations (HMR; 49 CFR Parts  
171-180) authorize a "non-DOT specification portable tank  
suitable for the transport of liquids" any portable tank, as  
defined in § 171.8, may be used for the transportation of  
liquids or solids as long as the portable tank meets the  
general packaging requirements in §§ 173.24 and 173.24b. If  
the HMR authorize its use, no exemption is required to use a  
non-DOT specification portable tank. In addition, there are  
no requirements in the HMR to identify a portable tank as a  
"non-DOT specification portable tank suitable for the  
transport of liquids."

I hope this satisfies your request.

Sincerely,

Thomas G. Allan

Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards



990061

173.241

# ROSSBOROUGH

MANUFACTURING CO. L.P.

Gak  
§ 173.241  
99-0061

Office of Hazardous Materials Standards  
Research and Special Programs Administration  
U.S. Department of Transportation  
400 Seventh Street, SW  
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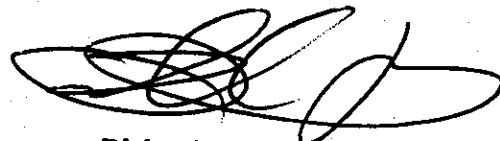
March 5, 1999

I would like to receive clarification on the regulations. From the Hazardous Material Table, for Calcium, the Bulk Packaging section, column 8C, references §173.241. In this section, paragraph c), contains the following, “; and non-DOT specification portable tanks suitable for transport of liquids”. Please provide clarification to the following questions:

1. Define “suitable for transport of liquids”?
2. Can these portable tanks contain solid calcium metal material?
3. Are there any other container or quantity restrictions/requirements?
4. Are any exemptions required for non-DOT specification portable tanks?
5. Do the portable tanks need to be identified as such?

Please forward the responses to me as soon as possible. Your attention to this clarification is greatly appreciated.

Sincerely,



Richard S. Varga  
Director Quality/Safety Systems

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